Whistleblowing Policy

Effective Date: September 2026

Review Date: April 2027

Introduction

Life Journey Academy Ltd is committed to maintaining the highest standards of integrity, transparency, and accountability in all its operations. We recognise that our work with vulnerable children and young people requires a culture of openness where concerns can be raised safely and addressed promptly. This Whistleblowing Policy provides a clear framework for reporting serious concerns about malpractice, misconduct, or risks to children, young people, adults, staff, or the organisation, ensuring that those who speak up are protected from detriment.

Whistleblowing is distinct from a personal workplace grievance, such as a concern relating solely to an individual's own employment, working arrangements or treatment at work. Personal workplace concerns should normally be raised directly with the appropriate director and handled separately from the whistleblowing procedure. This policy focuses on concerns about wrongdoing or matters in the public interest, including safeguarding failures, unlawful activity or risks to others.

Purpose

The purpose of this policy is to:

- Encourage staff, volunteers, and stakeholders to report suspected wrongdoing confidently and without fear of retaliation.
- Provide a clear procedure for raising and investigating whistleblowing concerns.
- Ensure compliance with the *Public Interest Disclosure Act 1998* and other relevant UK legislation.
- Protect the welfare of children, young people, and adults receiving support, and uphold the reputation of Life Journey Academy Ltd.

Scope

This policy applies to:

- All employees (permanent, temporary, or contracted).
- Volunteers, agency staff, and consultants working with Life Journey Academy.
- Commissioners (e.g., schools, local authorities) and other stakeholders who may wish to raise concerns about our operations.

It covers concerns raised about activities within Life Journey Academy Ltd or by external partners linked to our provision.

Legal Framework

This policy is informed by:

- Public Interest Disclosure Act 1998 (PIDA) - Protects workers from detrimental treatment or dismissal for raising concerns in the public interest.
- Employment Rights Act 1996 – Outlines protections for whistleblowers.
- Keeping Children Safe in Education (KCSIE) 2026 provides guidance on raising concerns about poor or unsafe safeguarding practice and potential failures in safeguarding arrangements.
- Equality Act 2010 – Ensures no discrimination against whistleblowers.

What is Whistleblowing?

Whistleblowing is the act of reporting serious concerns about wrongdoing that affects others, including:

- Criminal activity (e.g., fraud, theft).
- Failure to comply with legal obligations (e.g., health and safety breaches).
- Safeguarding risks or abuse of young people (e.g., neglect, inadequate supervision).
- Miscarriages of justice.
- Environmental damage caused by company activities.
- Deliberate concealment of any of the above.

This policy does not normally cover personal workplace grievances, such as individual pay disputes or concerns relating solely to a person's own employment or treatment at work. These should be raised with the appropriate director and handled separately from the whistleblowing procedure.

Our Commitment

Life Journey Academy Ltd will:

- Treat all whistleblowing disclosures seriously and investigate them impartially.
- Protect the identity of whistleblowers wherever possible (subject to legal requirements).
- Ensure that individuals who raise genuine concerns are treated fairly and are not subjected to retaliation, victimisation or disadvantage for speaking up.
- Take appropriate action to address substantiated concerns.

Roles and Responsibilities

All Staff and Volunteers

- Are encouraged to report concerns promptly if they suspect wrongdoing.
- Must follow the procedures outlined in this policy.

Designated Whistleblowing Officer

Lee Johnson, Director is the Designated Whistleblowing Officer, responsible for receiving and managing concerns.

Duties include:

- Ensuring confidentiality.
- Coordinating investigations.
- Reporting outcomes to Natalia Krasnianska as co-director, and where appropriate, to the relevant external authority.

Both Directors

Both directors are responsible for overseeing the implementation of this policy, ensuring investigations are conducted fairly, and escalating concerns to relevant

safeguarding agencies, commissioners, local authorities, police, or regulatory bodies where appropriate.

External Commissioners

May raise concerns about our provision and expect a timely response under this policy.

Procedure for Raising a Concern

Internal Reporting

- Raise the concern with the Designated Whistleblowing Officer, Lee Johnson. Where the concern involves Lee Johnson, raise it with Natalia Krasnianska directly.
- Provide as much detail as possible, including dates, individuals involved, and evidence (if available).
- Concerns can be raised verbally or in writing. Anonymous disclosures are accepted but may limit investigation scope.

Investigation

- The Designated Whistleblowing Officer will:
    - Acknowledge receipt within 5 working days.
    - Assess whether the concern qualifies as whistleblowing under PIDA.
- The Designated Whistleblowing Officer will assess whether the concern requires an internal review or referral to an external body. Given LJA's size, concerns of significant seriousness will ordinarily be referred to an external authority rather than investigated solely through internal means.
- Where an internal investigation is appropriate, LJA will aim to complete it within 20 working days, where possible, and will provide appropriate updates to the whistleblower where their identity is known. Where the concern involves safeguarding, suspected criminal conduct or another matter requiring referral to an external authority, LJA will follow the relevant safeguarding or statutory procedure and will not undertake an internal investigation where doing so could prejudice or conflict with that process.

Outcome

- The whistleblower will be informed of the investigation's conclusion (subject to confidentiality constraints).
- Actions may include internal improvements, disciplinary measures, or referral to external authorities (e.g., police, LADO, Ofsted).

Escalation (if needed)

Where a concern involves Lee Johnson, it should be raised directly with Natalia Krasnianska at contact@ljacademy.co.uk

Where a concern involves the Designated Whistleblowing Officer or both directors, escalation should go directly to the relevant external body. The external reporting routes below are available at any stage and do not require internal channels to be exhausted first where the concern involves those in positions of authority.

Where the concern relates to safeguarding practice, a failure to protect a child, or the way in which a safeguarding concern has been handled, staff and volunteers should raise the matter without delay. If they feel unable to raise the concern internally, or believe that a genuine safeguarding concern is not being addressed appropriately, they may seek external advice or report the concern through an appropriate external safeguarding or whistleblowing route.

External Reporting

If internal channels are exhausted or inappropriate (e.g., due to a cover-up), whistleblowers may contact:

- **Ofsted**: 0300 123 3155, whistleblowing@ofsted.gov.uk
- **NSPCC Whistleblowing Helpline**: 0800 028 0285, help@nspcc.org.uk
- **Protect (Charity)**: 020 3117 2520, whistle@protect-advice.org.uk

External disclosures must meet PIDA criteria (e.g., reasonable belief of wrongdoing and public interest).

Confidentiality and Anonymity

- Whistleblowers' identities will be protected unless disclosure is required by law (e.g., court order).

- Anonymous reports are accepted but may be harder to investigate or follow up.
- Records will be stored securely in line with GDPR and the Data Protection Act 2018.

Protection for Whistleblowers

- Workers who make a protected disclosure in accordance with whistleblowing legislation are protected from being subjected to detriment or unfair dismissal because they raised the concern. A concern raised reasonably will be taken seriously even where it is ultimately not substantiated.
- Victimisation or retaliation against whistleblowers is a disciplinary offence and may breach PIDA, entitling the individual to legal recourse.
- Malicious or knowingly false reports may lead to disciplinary action.

Training

- All staff will receive training on this policy during induction and annual refreshers.
- The Designated Whistleblowing Officer will undertake specialised training to handle disclosures effectively.

Monitoring and Review

- This policy will be reviewed annually or following significant legislative/practice changes.
- Feedback from staff and whistleblowing cases will inform improvements.
- Both directors will monitor the policy's effectiveness annually as part of the policy review process.

Contact Details

- **Designated Whistleblowing Officer**: Lee Johnson, 07765802889, contact@ljacademy.co.uk
- **External Helplines**: See Section “External Reporting”